

## KML LAW GROUP, P.C.

MICHAEL T. MCKEEVER\*

LISA A. LEE\*

KRISTINA G. MURTHA\*

BRIAN C. NICHOLAS\*

\*PA & NJ BAR

ATTORNEYS AT LAW

SUITE 5000

701 MARKET STREET

PHILADELPHIA, PENNSYLVANIA 19106-

1532

(215) 627-1322

(866) 413-2311

FAX (215) 627-7734

CAITLIN M. DONNELLY\*

NICHOLAS J. ZABALA\*

REBECCA A. SOLARZ\*

NORA C. VIGGIANO\*

DENISE CARLON\*

RICHARD ABEL

UJALA AFTAB\*

EVAN J. HARRA\*

MARIA MIKSICH

J. ERIC KISHBAUGH\*

BROOKE R. WAISBORD

[WWW.KMLLAWGROUP.COM](http://WWW.KMLLAWGROUP.COM)

January 22, 2021

Chief Judge Magdeline D. Coleman  
United States Bankruptcy Court  
Eastern District of Pennsylvania  
Robert N.C. Nix Sr. Federal Courthouse  
900 Market Street  
Philadelphia, PA 19107

RE: In re Joseph Walker, 19-12097 MDC  
M&T Bank v. Walker, Motion to Dismiss

Dear Judge Coleman:

I represent M&T Bank in the above-captioned bankruptcy in which M&T Bank filed a Motion to Dismiss or, in the alternative, for Relief from the Automatic Stay on September 18, 2020. On December 3, 2020, Your Honor required that the parties file any additional documentary evidence by January 8, 2021. Based upon the submitted documents, either party could then file a response requesting that a supplemental evidentiary hearing be heard on February 19, 2021.

Pursuant to Your Honor's instructions, I am requesting that the evidentiary hearing take place on February 19, 2021 to allow for testimony from Debtor regarding the documents he filed on January 8, 2021 and January 9, 2021.

Your Honor's consideration in this matter is greatly appreciated.

Respectfully yours,

KML LAW GROUP, P.C.

/s/Rebecca A. Solarz

Rebecca A. Solarz

Attorney for M&T Bank

215-825-6327

rsolarz@kmllawgroup.com

cc: Irwin Trauss via electronic notification and email